

Texas Alternative to Abortion Services Program

Prepared by:



—T E X A S —
PREGNANCY CARE
—N E T W O R K —

November 2016



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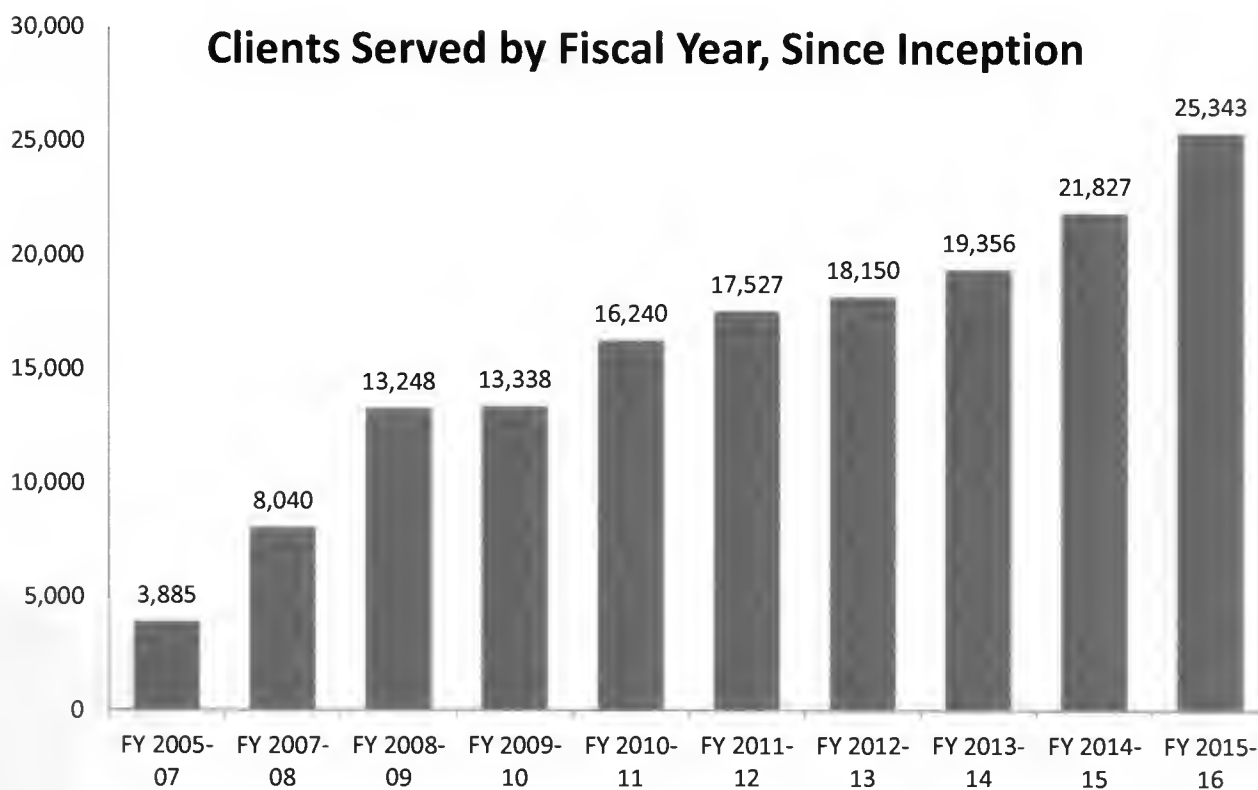


MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Performance: Clients Served**

From Program inception through August 31, 2016:

- **Clients served:** **156,954¹**
- **Client Complaints:** **0**



¹ Sources: Quarterly Status Reports, Q4, FY 2005-2006, FY 2006-07, FY 2007-08, FY 2008-09, FY 2009-10, FY 2010-11, FY 2011-12, FY 2012-13, FY 2013-14, FY 2014-15, FY 2015-16 (combined YTD client totals); On file, Texas Health and Human Services Commission



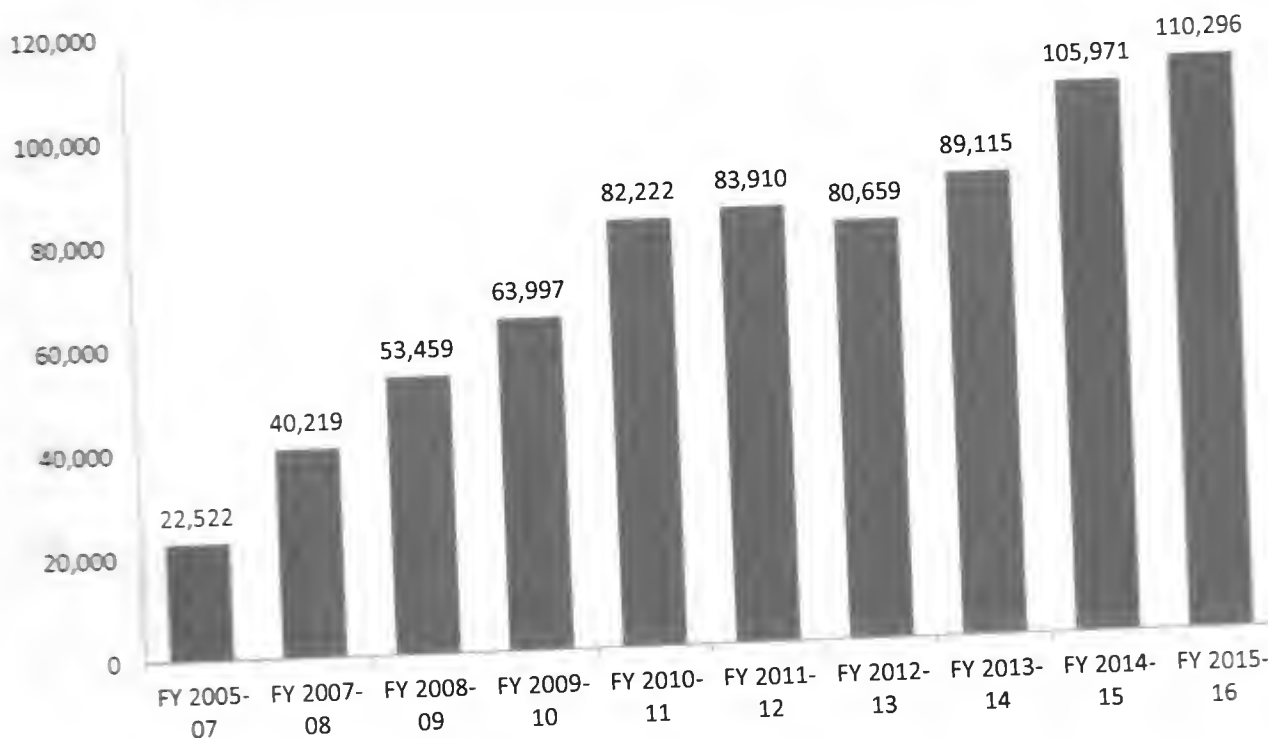
MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Performance: Client Visits**

From Program inception through August 31, 2016:

- Client visits²: **732,370³**
- Client Complaints: **0**

Client Visits by Fiscal Year, Since Inception



² Client visits identifies how many times an individual Program client returns for services.

³ Sources: Quarterly Status Reports, Q4, FY 2005-06, FY 2006-07, FY 2007-08, FY 2008-09, FY 2009-10, FY 2010-11, FY 2011-12, FY 2012-13, FY 2013-14, FY 2014-15, FY 2015-16 (combined YTD client visit totals); On file, Texas Health and Human Services Commission

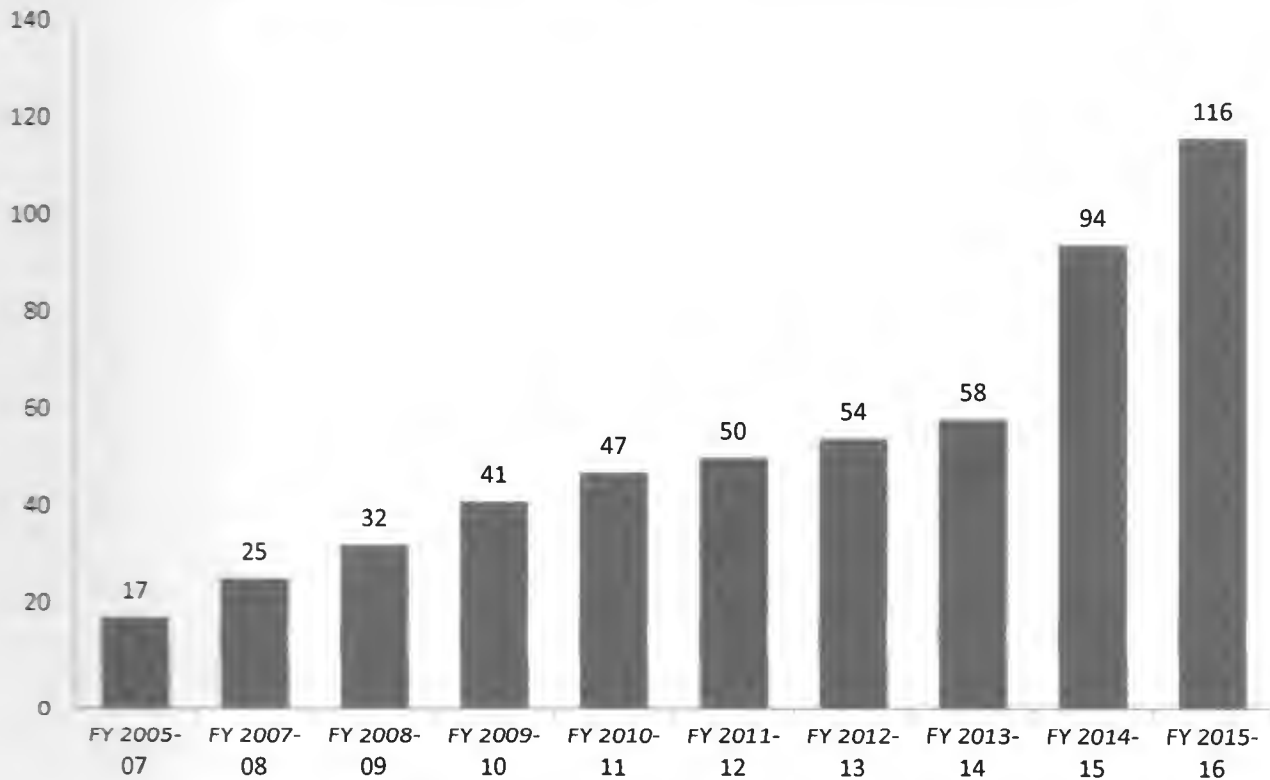


MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara
DATE: November, 2016
RE: **Program Performance: Program Locations Since Inception**

At the end of FY 2015-16, the Program had 116 locations providing Client Services in Texas.

Program Locations in Texas, Since Inception



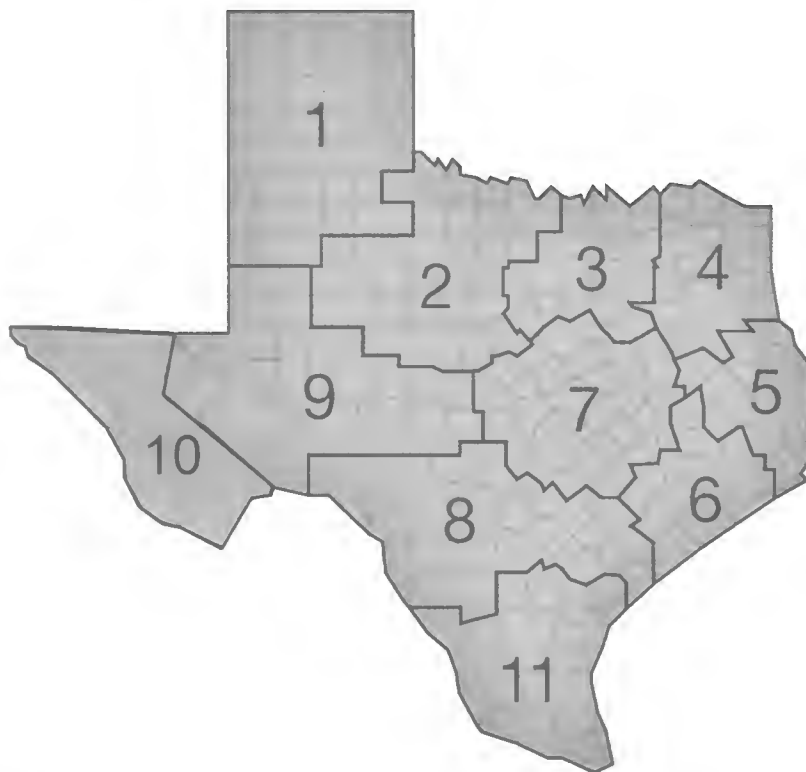


MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Performance: Program Locations in HHSC Regions**

Number of HHSC Regions with Provider contract, as of November 2016: 11 of 11

Currently in: Regions 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 & 11



PROVIDER LOCATIONS:

| Provider Location Name | City | Zip | County | Region |
|---|--------------|-------|----------|--------|
| Children's Connections Inc. - Amarillo | Amarillo | 79109 | Potter | 1 |
| Hope Cottage - Lubbock | Lubbock | 79412 | Lubbock | 1 |
| Children's Connections Inc. - Lubbock | Lubbock | 79423 | Lubbock | 1 |
| Pregnancy Resources of Abilene | Abilene | 79603 | Taylor | 2 |
| The Open Door Pregnancy Center - Breckenridge | Breckenridge | 76424 | Stephens | 2 |
| The Open Door Pregnancy Center - Cisco | Cisco | 76437 | Eastland | 2 |



| Provider Location Name | City | Zip | County | Region |
|--|---------------|-------|----------|--------|
| Children's Connections Inc. - Abilene | Abilene | 79606 | Taylor | 2 |
| Children's Connections Inc. - Wichita Falls | Wichita Falls | 76310 | Wichita | 2 |
| Birth Choice | Dallas | 75243 | Dallas | 3 |
| Bridges Safehouse, Inc. - Main | Cedar Hill | 75104 | Dallas | 3 |
| Bridges Safehouse, Inc. - Thrifty Boutique | Cedar Hill | 75104 | Dallas | 3 |
| Catholic Charities of Dallas - Main | Dallas | 75243 | Dallas | 3 |
| Catholic Charities of Dallas - West Dallas Family Service Ctr. | Dallas | 75212 | Dallas | 3 |
| Children & Family Institute - Dallas | Dallas | 75232 | Dallas | 3 |
| Children & Family Institute - Ft. Worth | Fort Worth | 76011 | Tarrant | 3 |
| Children's Connections Inc. - Dallas | Dallas | 75209 | Dallas | 3 |
| Children's Connections Inc. - Ft. Worth | Fort Worth | 76102 | Tarrant | 3 |
| Children's Connections Inc. - Gainesville | Gainesville | 76240 | Cooke | 3 |
| ChristianWorks | Dallas | 75230 | Dallas | 3 |
| Family Care Connection - South Dallas | Dallas | 75237 | Dallas | 3 |
| Family Care Connection - Main Office | Dallas | 75237 | Dallas | 3 |
| Family Care Connection - West Dallas | Dallas | 75212 | Dallas | 3 |
| First Look | Waxahachie | 75165 | Ellis | 3 |
| Gladney Center for Adoption | Fort Worth | 76132 | Tarrant | 3 |
| Hope Cottage - Dallas | Dallas | 75204 | Dallas | 3 |
| Hope Mansion | Cedar Hill | 75104 | Dallas | 3 |
| Involved for Life - Downtown Pregnancy Center | Dallas | 75201 | Dallas | 3 |
| Involved for Life - Uptown Women's Center | Dallas | 75204 | Dallas | 3 |
| Loreto House | Denton | 76201 | Denton | 3 |
| Low Birth Weight Development Center | Dallas | 75211 | Dallas | 3 |
| Metroplex Mobile Pregnancy Clinic | Arlington | 76010 | Tarrant | 3 |
| Metroplex Women's Clinic - Mansfield | Mansfield | 76063 | Tarrant | 3 |
| Metroplex Women's Clinic - North | Arlington | 76012 | Tarrant | 3 |
| Metroplex Women's Clinic - Southeast | Arlington | 76018 | Tarrant | 3 |
| Metroplex Women's Clinic - Southwest | Arlington | 76017 | Tarrant | 3 |
| Rafra Clinic - Commerce | Greenville | 75401 | Hunt | 3 |
| Children's Connections Inc. - Texarkana | Texarkana | 75503 | Bowie | 4 |
| Children's Connections Inc. - Tyler | Tyler | 75701 | Smith | 4 |
| Expectant Heart Pregnancy Resource Center | Longview | 75604 | Gregg | 4 |
| Expectant Heart Pregnancy Resource Center II | Longview | 75601 | Gregg | 4 |
| First Choice Pregnancy Resource Center | Texarkana | 75501 | Bowie | 4 |
| Hope Cottage - Tyler | Tyler | 75701 | Smith | 4 |
| Living Alternatives of Jacksonville | Jacksonville | 75766 | Cherokee | 4 |
| Living Alternatives of Palestine | Palestine | 75801 | Anderson | 4 |
| Paris Pregnancy Care Center | Paris | 75460 | Lamar | 4 |



| Provider Location Name | City | Zip | County | Region |
|--|-------------|-------|------------|--------|
| Paris Pregnancy Care Center of Red River County | Clarksville | 75426 | Red River | 4 |
| Raffa Clinic - Quinlan | Quinlan | 75474 | Hunt | 4 |
| Children's Connections Inc. - Beaumont | Beaumont | 77707 | Jefferson | 5 |
| Children's Connections Inc. - Lufkin | Lufkin | 75904 | Angelina | 5 |
| Living Alternatives of Palestine - Crockett | Crockett | 75835 | Houston | 5 |
| Pregnancy Help Center of Lufkin | Lufkin | 75904 | Angelina | 5 |
| Anchor Point - League City | League City | 77573 | Galveston | 6 |
| Anchor Point - Seabrook | Seabrook | 77586 | Harris | 6 |
| Catholic Charities of the Archdiocese of Galveston-Houston - Central Office | Houston | 77006 | Harris | 6 |
| Catholic Charities of the Archdiocese of Galveston-Houston - Fort Bend County | Stafford | 77477 | Ft. Bend | 6 |
| Catholic Charities of the Archdiocese of Galveston-Houston - Mamie George Community Center | Richmond | 77469 | Harris | 6 |
| Catholic Charities of the Archdiocese of Galveston-Houston - Moran Health Center | Houston | 77002 | Harris | 6 |
| Children's Connections Inc. - Houston | Houston | 77098 | Harris | 6 |
| Houston Pregnancy Help Center - Downtown | Houston | 77004 | Harris | 6 |
| Houston Pregnancy Help Center - Fifth Ward | Houston | 77020 | Harris | 6 |
| Houston Pregnancy Help Center - Mobile Medical Van | Houston | 77004 | Harris | 6 |
| The Source for Women - Galleria | Houston | 77057 | Harris | 6 |
| The Source for Women - Northeast | Houston | 77093 | Harris | 6 |
| The Source for Women - Spring Branch | Houston | 77055 | Harris | 6 |
| Waller Pregnancy Care Center | Waller | 77484 | Waller | 6 |
| Annunciation Maternity Home | Georgetown | 78628 | Williamson | 7 |
| Austin LifeCare | Austin | 78757 | Travis | 7 |
| Care Net of Central Texas Medical Services | Waco | 76710 | McLennan | 7 |
| Care Net Pregnancy Support Center and Guesthouse | Waco | 76701 | McLennan | 7 |
| Catholic Charities of Central Texas - Counseling Services | Austin | 78754 | Travis | 7 |
| Central Texas LifeCare – Main | San Marcos | 78666 | Hays | 7 |
| Central Texas LifeCare – Ranch | San Marcos | 78666 | Caldwell | 7 |
| Children's Connections Inc. - Austin | Austin | 78757 | Travis | 7 |
| Children's Connections Inc. - Bryan | Bryan | 77802 | Brazos | 7 |
| Children's Connections Inc. - Killeen | Killeen | 76542 | Bell | 7 |
| Children's Connections Inc. - San Marcos | San Marcos | 78666 | Hays | 7 |
| Children's Connections Inc. - Waco | Waco | 76710 | McLennan | 7 |
| Gabriel Project Life Center - Austin | Austin | 78754 | Travis | 7 |
| Gabriel Project Life Center - Brazos Valley | Bryan | 77801 | Brazos | 7 |
| Our Lady of the Angels Maternity Shelter | Temple | 76504 | Bell | 7 |
| Pregnancy Help Center of Williamson County | Georgetown | 78626 | Williamson | 7 |
| St. John Paul II Life Center | Austin | 78731 | Travis | 7 |



| Provider Location Name | City | Zip | County | Region |
|--|----------------|-------|-----------|--------|
| American Indians in Texas – San Antonio Fatherhood Campaign | San Antonio | 78228 | Bexar | 8 |
| American Indians in Texas – Healing a Wounded Spirit | San Antonio | 78207 | Bexar | 8 |
| A Woman's Haven | San Antonio | 78240 | Bexar | 8 |
| Catholic Counseling & Consultation Center | San Antonio | 78205 | Bexar | 8 |
| Children's Connections Inc. - Eagle Pass | Eagle Pass | 78852 | Maverick | 8 |
| Children's Connections Inc. - San Antonio | San Antonio | 78212 | Bexar | 8 |
| Children's Connections Inc. - Victoria | Victoria | 77904 | Victoria | 8 |
| Guadalupe Home | San Antonio | 78207 | Bexar | 8 |
| Life Choices Medical Clinic | San Antonio | 78238 | Bexar | 8 |
| Providence Place | San Antonio | 78240 | Bexar | 8 |
| SAMMinistries - Blanco | San Antonio | 78216 | Bexar | 8 |
| SAMMinistries - Haven | San Antonio | 78207 | Bexar | 8 |
| SAMMinistries - Piedras | San Antonio | 78228 | Bexar | 8 |
| San Antonio Birth Doulas | San Antonio | 78207 | Bexar | 8 |
| Seton Home | San Antonio | 78210 | Bexar | 8 |
| St Jude's Ranch for Children - Bulverde | Bulverde | 78163 | Comal | 8 |
| St Jude's Ranch for Children - New Braunfels | New Braunfels | 78132 | Comal | 8 |
| St Jude's Ranch for Children - San Antonio | San Antonio | 78217 | Bexar | 8 |
| Children's Connections Inc. - Midland | Midland | 79705 | Midland | 9 |
| Children's Connections Inc. - San Angelo | San Angelo | 76904 | Tom Green | 9 |
| The Life Center - Andrews | Andrews | 79714 | Andrews | 9 |
| The Life Center - Big Spring | Big Spring | 79720 | Howard | 9 |
| The Life Center - Midland | Midland | 79701 | Midland | 9 |
| The Life Center - Odessa | Odessa | 79761 | Ector | 9 |
| Children's Connections Inc. - El Paso | El Paso | 79901 | El Paso | 10 |
| Hope Cottage - El Paso | El Paso | 79902 | El Paso | 10 |
| Catholic Charities of the Rio Grande Valley - Brownsville Office | Brownsville | 78520 | Cameron | 11 |
| Catholic Charities of the Rio Grande Valley - San Juan Office | San Juan | 78589 | Hidalgo | 11 |
| Children's Connections Inc. - Corpus Christi | Corpus Christi | 78415 | Nueces | 11 |
| Children's Connections Inc. - Edinburg | Edinburg | 78539 | Hidalgo | 11 |
| Children's Connections Inc. - Laredo | Laredo | 78045 | Webb | 11 |
| Corpus Christi Hope House | Corpus Christi | 78404 | Nueces | 11 |

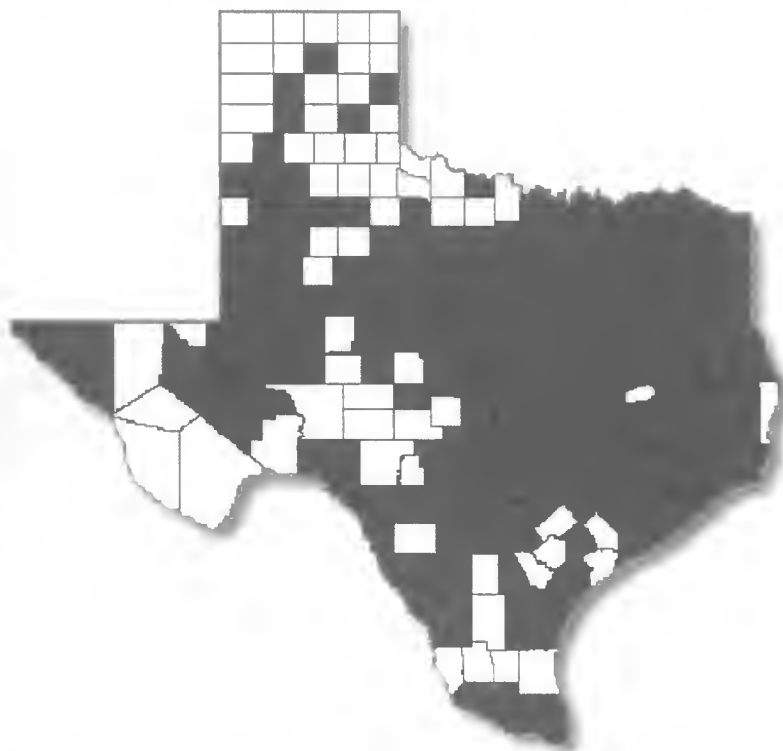


MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Performance: Client Origin, By County**

From Program inception through August 31, 2015:

- Client Counties of Origin: **189⁴**
Counties of Residence of Clients Served Since Program Inception



- Residents of the 189 counties served by the Program accounted for 99.4% of all abortions in the state according to 2013 data available from DSHS.⁵
- The highest percentage of Program clients are ages 20-24, which corresponds to the highest percentage of women by age seeking abortions in Texas.⁶

⁴ Sources: Quarterly Status Reports, Q4, FY 2005-06, FY 2006-07, FY 2007-08, FY 2008-09, FY 2009-10, FY 2010-11, FY 2011-12, FY 2011-12, FY 2012-13, FY 2013-14, FY 2014-15, FY 2015-16 (YTD Clients by Age) (combined totals)

⁵ Texas Department of State Health Services, Vital Statistics 2013 Annual Report, Table 34, "Induced Terminations of Pregnancy by Age and County of Residence."

⁶ Texas Department of State Health Services, Vital Statistics 2013 Annual Report, Table 34, "Induced Terminations of Pregnancy by Age and County of Residence."



MEMO

TO: Program Inquiry: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Performance: Contractor Standards for Excellence**

- In 2009, Texas Pregnancy Care Network earned the Seal of Excellence[®], in recognition for meeting the highest standards of ethics and accountability in its nonprofit governance, management, and operations.
- TPCN is the first nonprofit organization in Texas to earn the Seal of Excellence[®] distinction.
- A national peer review team of nonprofit experts evaluated TPCN for compliance with 55 standards comprising the *Standards for Excellence: An Ethics and Accountability Code for the Nonprofit Sector*, designed by the Standards for Excellence Institute[®].
- Based in Maryland, the Standards for Excellence Institute is a national initiative that promotes the highest standards of ethics and accountability in nonprofit governance, management, operations, and facilities.
- Every five years, the Standards for Excellence Institute undertakes another in-depth examination of organizations that hold the Seal of Excellence[®]. In 2014, TPCN was re-certified with the Seal of Excellence[®] by the Standards for Excellence Institute.



MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Performance: Metrics**

The Quarterly Status Report is the primary vehicle for reporting Program metrics.

The Quarterly Status Report identifies hundreds of actual outcomes and metrics including but not limited to the following:

- Visitors to www.texaspregnancy.org; Professionals educated about Program through Community Outreach strategy; Number of Provider sites participating; Number of clients served; Number of client visits; Number of clients who attended Parenting Class; Number of Clients counseled on Parenting Skills; Number of clients who received Adoption Education

The Quarterly Status Report provides data regarding:

- Incidence of counseling, mentoring, and referrals related to:
 - Abortion Education; Abuse; Adoption Education; Anger Management; Baby proofing Home; Breastfeeding; Breast Pumping; Budgeting for Family; Car seat Training; Child Support; Child Vaccinations; Childbirth; Cord Blood Banking; C-Section Primer; Daycare; Decision Making; Education; Financial; Guardianship; Housing; Infant CPR; Initial Intake; Legal; Life Skills; Maternal Well-Being; Maternity Leave; Medical; Newborn Care; Newborn Wrapping; Other ; Postpartum Depression; Parenting; Prenatal Care; Prenatal Development; Prenatal Exercise; Prenatal Nutrition; Relationship; Sleep Strategy; Smoking Cessation; Stress Management; STD Information/Risks; Ultrasound Education
- Incidence of Education Classes related to: Certified Childbirth Instruction; Family Support; Newborn Care; and Pre-Natal Care
- Incidence of Materials Assistance related to: Baby Accessories; Baby Clothing; Baby Furniture; Diapers; Food; Maternity Clothing; and Toiletries

The Quarterly Status Report identifies the amount of services billed for:

- Counseling/Mentoring; Education Classes for Clients; Education Classes for Client's Family; Family Counseling/Mentoring; Materials Assistance: On-Site; Phone Counseling/Mentoring; Referrals

The Quarterly Status Report identifies data associated with outreach efforts, including:

- Unique visits to www.texaspregnancy.org outreach website



MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Performance: Outreach Strategy**

The outreach advertising strategy for the Alternatives Program remains primarily focused on online advertisements.

- Online ads placed refer potential clients to texaspregnancy.org outreach website
- Visitors are directed to a zip code-based locator so they can find the Provider closest to them
- Additionally, many other types of advertising mediums have been used for public awareness campaigns including billboards, radio, television, and print.



MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Performance: FY 2015-16 4th Quarter Contractual Performance Measures**

TPCN and HHSC entered into a new contract that began in the 4th Quarter of Fiscal Year 2015-16. The following is a summary of TPCN's performance against its stated contract goals for the 4th Quarter of Fiscal Year 2015-16:

| TPCN's 4 th Quarter Contractual Goal: | TPCN Exceeded Goal by: |
|---|----------------------------|
| TPCN will educate at least 750 school nurses, school counselors, and other professionals who are able to refer potential clients to its services. | TPCN Exceeded Goal by 6% |
| TPCN will be providing services in at least 105 locations. | TPCN Exceeded Goal by 10% |
| TPCN will serve at least 5,050 clients in the state. | TPCN Exceeded Goal by 75% |
| TPCN clients will make at least 24,000 visits to Provider locations. | TPCN Exceeded Goal by 31% |
| At least 900 clients will attend parenting classes. | TPCN Exceeded Goal by 79% |
| At least 2,000 clients will be counseled on parenting skills. | TPCN Exceeded Goal by 165% |
| At least 900 clients will be counseled on adoption. | TPCN Exceeded Goal by 127% |



MEMO

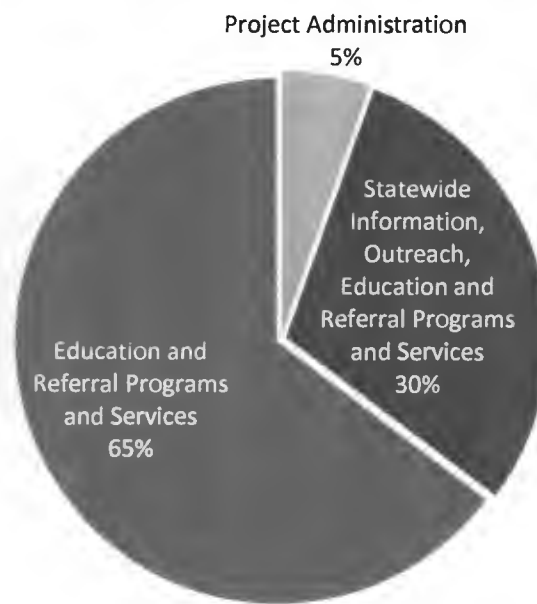
TO: Texas Alternative to Abortion Services Program
FROM: John McNamara
DATE: November, 2016
RE: **Program Expenditures: FY 2015-16 Costs**

Final costs for FY 2015-16⁷:

- Project Administration: \$498,588.07
- Statewide Information, Outreach, Education and Referral Programs and Services: \$2,726,655.27
- Client Services: \$5,924,756.66

Administrative costs only comprised 5% of the entire Program fiscal budget.

Final costs for FY 2015-16



⁷ Source: Monthly Financial Report, August 2016; On file, Texas Health and Human Services Commission



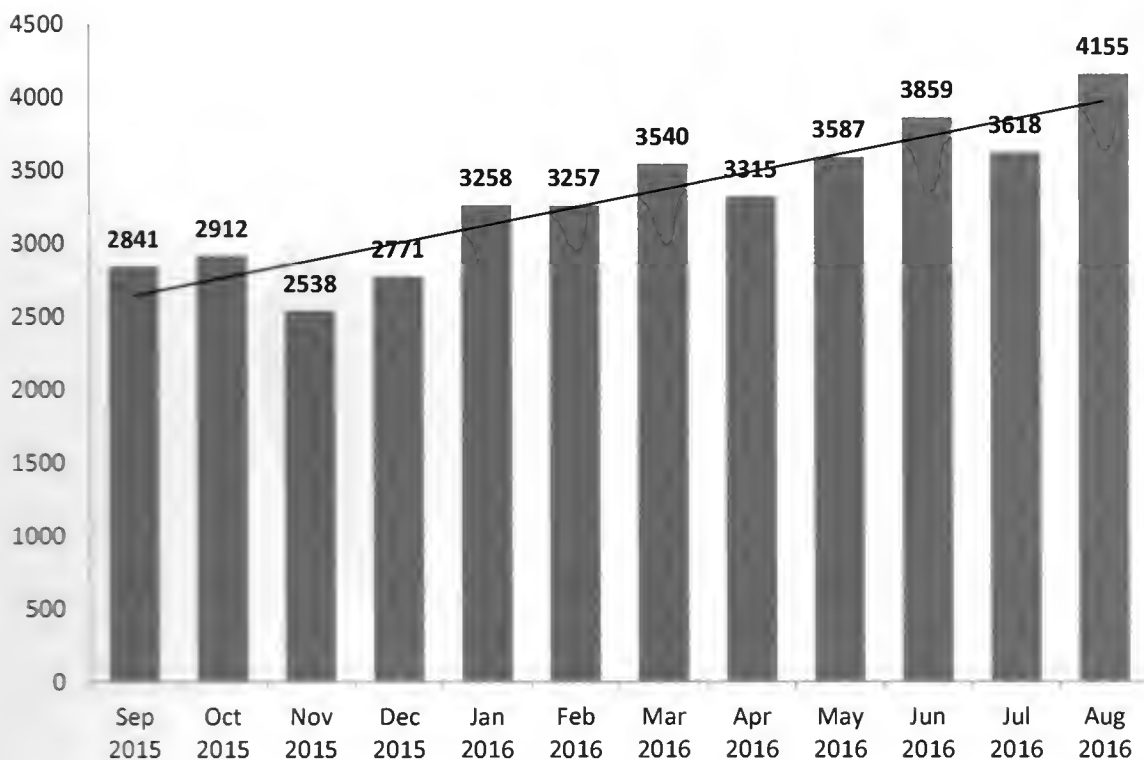
MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara
DATE: November, 2016
RE: **Program Expansion: Clients Served During FY 2015-16**

Fiscal Year 2015-16 had tremendous growth for the Program from beginning to end:

- Number of Clients Served in September 2015: **2,841**
- Number of Clients Served in August 2016: **4,155 (46% increase from Sep 2015)**

Monthly Growth in Clients Served Fiscal Year 2015-16





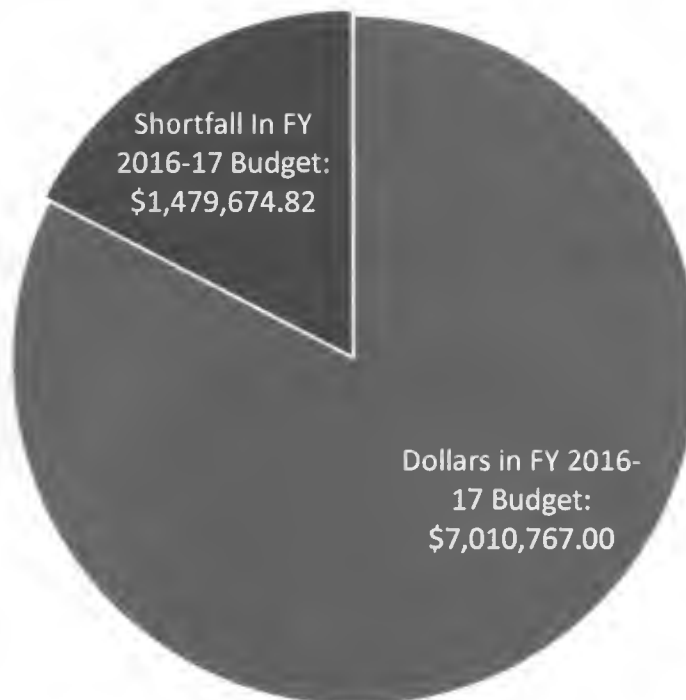
MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara
DATE: November, 2016
RE: **Program Expansion: FY 2016-17 Client Services Shortfall**

Projected Program Expenditures: 2016-17 Client Services

- FY 2016-17 Reimbursements Earned Through October 2016 = \$ 1,257,627.35 ⁸
- Projected Services To Be Invoiced For Remainder of FY 2016-17 = \$ 7,234,042.67 ⁹
- **FY 2016-17 Client Services Reimbursement Shortfall = \$ 1,479,674.82**

FY 2016-17 Projected Provider Shortfall



⁸ October 2016 Monthly Financial Report to HHSC

⁹ This is an estimate based on annualizing the amount of reimbursements through October 2016 (FY 2016-17) based on historical reimbursement levels from FY2014-15. This is purely an estimate and is subject to change. The actual amount of Program reimbursement for FY 2016-17 will be reported to HHSC in the Quarterly Report covering the 4th Quarter of FY 2016-17.



MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Providers: Pregnancy Support Center Participation**

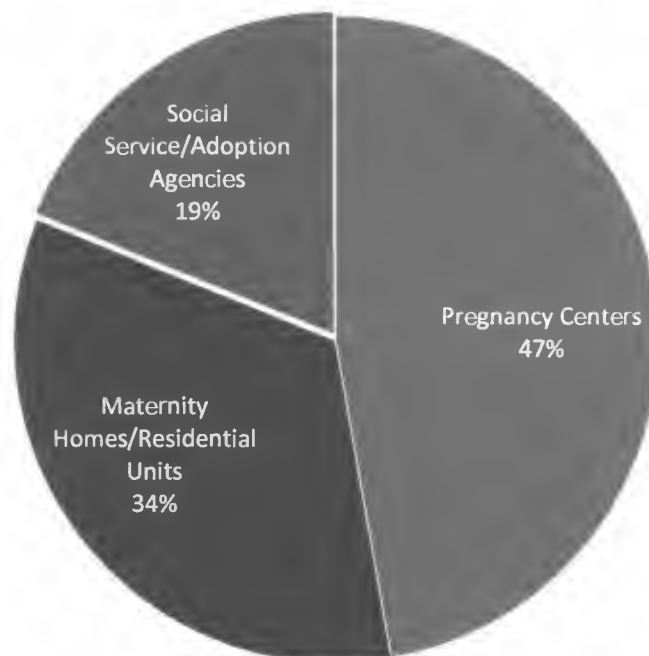
Critics characterize the Program as funding only for "crisis pregnancy centers."

- Historically, pregnancy support centers are recipients of less than 48% of reimbursements. Social service agencies, adoption agencies, and maternity homes combine as the largest funding recipients.

Some national reports have accused crisis pregnancy centers of practices that deceive or scare clients. Organizations of this kind are not participating in the Program:

- TPCN ensures it only contracts with organizations that provide compassionate and caring client services.
- TPCN reviews potential providers' phone procedures and advertisements thoroughly as part of its evaluation to make sure clients know the scope of services.
- TPCN does not approve of the use of graphic images or descriptions of abortions, regardless of whether a client consents.

FY 2015-16 Services Invoiced - Type of Provider





MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Providers: Types of Organizations**

- Participating Providers are diverse
- All offer the core service of decision-making support in favor of childbirth rather than abortion
- All are IRS 501(c)3 organizations
- All Providers serve their clients free of charge
- Among the Program's Providers are:
 - Licensed residential care facilities;
 - Social service agencies that provide long-term case management by licensed social workers;
 - Pregnancy support centers that offer crisis mentoring, education classes, and materials support both during and after pregnancy;
 - A birth doula organization that specializes in education and support during childbirth; and
 - Licensed adoption agencies that help clients decide between parenting and adoption.
- Several of the Providers offer more than just one service; for example, one provider is licensed as both a residential care facility and an adoption agency.



MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Providers: Support Provided to Clients**

The Program's Providers:

- Educate. Many women want to continue their pregnancy, but feel internal pressure to abort. Providers educate women about how continuing with a pregnancy—and life beyond pregnancy—is possible.
- Protect. A “woman’s right to choose” is often exercised not by women, but by coercive boyfriends, husbands, or parents. Providers represent a refuge from external pressure placed on women by others during a difficult pregnancy.
- Comfort. Like anyone in crisis, women in crisis pregnancy primarily need someone to talk to. Providers help relieve the despair that can lead to panicked decision-making.
- Provide. The Program provides mentoring, education classes, materials assistance, referrals to community and medical resources, and adoption education.
- Connect. Through referrals, Providers connect clients with community and medical resources to help them throughout their pregnancy and after their child is born.



MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Providers: Selection Process**

Standards are high. The following is a non-exhaustive list of documents and items examined as part of the Provider application:

- Incorporation Documents
- IRS 501(c)(3) Notice
- Names and Addresses of Board of Directors
- Bylaws
- Mission Statement
- Insurance Coverage
- Form 990
- Licenses
- Good Standing with State
- Org Chart
- Diplomas, Licenses and Certifications
- Training and Orientation Materials
- Nondiscrimination Policy
- Full Menu of Services
- Website and Social Media
- Advertising
- Proof of Free Services
- Proof that Services Offered for at least 1 year
- Education Materials
- Policies and Procedure Manual
- Policies on Abortion and Abortifacient Contraception
- Client Nondiscrimination Policy
- Client Confidentiality Policy
- Release of Information Policy
- Client Grievance Policy
- English Limitation Policy
- Facilities Floor Plan
- List of Referral Sources



MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Providers: Quality Control & Monitoring**

After Provider Selection Process (see Memo Re: Selection Process), TPCN inspects the physical locations during a Facilities Tour. Approved locations must (list not exhaustive):

- be handicapped accessible or have the capability to make special provisions for persons with disabilities
- be clean, comfortable, facilitate confidential services, and meet fire safety measures
- demonstrate evidence that key employee and client policies are accessible, living documents within the organization

After the Facilities Tour, Provider staff (list not exhaustive):

- are trained in Program compliance
- are re-trained annually (mandatory) at end of each fiscal year
- must undergo child abuse, criminal background, and sexual predator checks; must be renewed annually
- must certify they have a four-year degree in a social service or nursing field of study, or otherwise have received comprehensive pregnancy counseling/mentoring skills orientation and training
- must agree to follow policies on non-discrimination, confidentiality, and limited English proficiency

Ongoing monitoring begins once new Provider begins services, and occurs in various forms daily, monthly, and annually (list not exhaustive):

- **Daily:** The online billing system enforces the billing requirements so that each invoice entered must comply with Program reimbursement rules. TPCN manually inspects invoices, scrutinizing invoices for errors or non-compliance. A full-time staff person is dedicated to managing this task.
- **Monthly:** TPCN reviews Provider performance to detect areas that may need further Program training. Review is conducted by another full-time staff person; yet another full-time position is dedicated to ongoing Program training.
- **Annually:** Every Provider receives in-person Annual Monitoring. Physical facilities are again inspected; management is interviewed to alert changes to corporate and organizational policies; and client files are matched with reimbursed invoices to confirm services can be substantiated.
- As a result of any non-compliance with services already reimbursed by the Program, TPCN deducts the value of those services from the Provider's next-month reimbursement.



MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Purpose: Why Abortion Alternatives?**

- The purpose of the Texas Alternative to Abortion Services Program is to enhance and increase resources available to women facing unplanned pregnancies that promote childbirth rather than abortion.
- Abortion Alternatives are:
 - Necessary. The Program does not create needs; it responds to them. Thousands of women seek alternatives to abortion every day. Public funding helps ensure continuity and availability of quality services throughout Texas.
 - Progressive. Abortion alternatives represent a refreshing and rare middle ground when it comes to abortion-related issues. Allegiance to abortion rights or restrictions is irrelevant; the only allegiance required is to helping pregnant women.
 - Smart. Eliminating the crisis in an unplanned pregnancy is a more intelligent response than eliminating the pregnancy itself. Program Providers help eliminate the crises, and help women understand how continuing with their pregnancy is possible.
 - Decent. A society that is decent should provide pregnant women who are alone, scared, and under pressure more than just the choice of abortion as a response to an unplanned pregnancy.



MEMO

TO: Texas Alternative to Abortion Services Program
FROM: John McNamara, Esq.
DATE: November, 2016
RE: **Program Purpose: Social Services**

- The Program is a social services program. It is not intended to be medical.¹⁰
- The Texas Alternative to Abortion Services Program is no different than other social services programs, like Family Violence. The core services are counseling, mentoring, education, materials assistance, shelter, and referrals.
- Pregnant women seek more than the medical community can provide.
- The medical community does not provide counseling, mentoring, education, materials assistance, and shelter to pregnant women. They refer to social service agencies to provide these services.

¹⁰ Some Providers do provide limited medical services; however, these are not a part of the Program and are not reimbursed by the Program.